

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Georgia-Pacific Wood Products LLC
11795 Brookneal Highway (Hwy 501S) Gladys, Virginia
Permit No. SCRO30903

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Georgia-Pacific Wood Products LLC has applied for a renewal of their Title V Operating Permit for its Campbell County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____

Air Permit Manager: _____

Regional Director: _____

FACILITY INFORMATION

Permittee

Georgia-Pacific Wood Products LLC
P.O. Box 340
Brookneal, VA 24528

Facility

Georgia-Pacific Wood Products LLC
11795 Brookneal highway (Hwy 501S)
Gladys, Virginia

County-Plant Identification Number: 51-031-00163

SOURCE DESCRIPTION

NAICS Code: 321219 - The facility manufactures a reconstituted wood product known as oriented strandboard (OSB).

Based on Georgia-Pacific's (GP) permit renewal application, the facility is a Title V major source of PM10, NOx, CO, VOC, HCl, and methanol. This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was previously permitted under a Minor NSR Permit issued on September 17, 1997, as amended April 10, 1998, December 3, 1999, August 28, and December 3, 2002, June 30, 2003, and January 22, 2007 (referred to in this Statement of Basis as the "1/22/07 permit").

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units, pollution control devices, and stacks are those units as described in the table in Section II of this Title V permit.

EMISSIONS INVENTORY

Emissions are summarized in the following tables.

2006 Actual Emissions

	2006 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	107.1	169.8	15.1	117.0	157.9

2006 Facility Hazardous Air Pollutant Emissions

Pollutant	2006 Hazardous Air Pollutant Emission in Tons/Yr
Acetaldehyde	2.5
Formaldehyde	5.1
Hydrogen chloride	8.8
Methanol	22.3
Lead	2.1×10^{-3}
Phenol	3.7

EMISSION UNIT APPLICABLE REQUIREMENTS

The following section discusses requirements for the emissions units at GP. These requirements come from the 1/22/07 permit, and applicable federal requirements. The conditions are not repeated verbatim from the permit.

Section III.A of the Title V Permit – Log Debarkers (Emission Unit 1200)

Debarker Limitations

The limits for the debarking equipment are from the 1/22/07 permit and consist of a visible emissions limit.

Debarker Monitoring

Periodic visible emissions observations are required for the debarking equipment.

Debarker Recordkeeping

Records of visible emissions observations must be kept to demonstrate compliance.

Debarker Testing

None

Debarker Reporting

The only reporting requirements for the debarking equipment are the general reporting requirements as shown in Section IX.E, General Conditions.

Section III.B of the Title V Permit – Wellons/dryer system (Emission Unit 3500)

Wellons/dryer system Limitations

The limits for the Wellons/dryer system are from the 1/22/07 permit, and include specification of air pollution control devices and their operation, approved fuels, allowable fuel throughputs, current NSPS Db standards, visible emissions limits, and emissions limits. The limitations subsection also includes a cross-reference to MACT limitations as set out in section IV of the permit.

Note: At GP's request, the description of emissions unit 3500 was expanded to include the (3) 15 MMBtu/hr natural gas burners that were added to the system in 1998. These burners were exempt for NSR permitting due to their size. The approved fuel for these burners is also added to the current Title V permit renewal.

Wellons/dryer system Monitoring

Monitoring for the Wellons/dryer consists of an opacity monitor from the 1/22/07 permit. The monitoring subsection also includes a cross-reference to MACT requirements as set out in section IV of the permit.

VOC, CO, NOx, and PM10 emissions from the Wellons/dryer system are subject to Compliance Assurance Monitoring (CAM). Three CAM plans for these Pollutant Specific Emissions Units (PSEUs) are attached to the permit and implementation of each of these CAM plans is specified for the Wellons/dryer emissions unit. (Note: A single CAM plan, Attachment A, addresses both VOC and CO.) This emission unit specific monitoring subsection also includes a cross-reference to General CAM Provisions as set out in section V of the permit. (Note: The VOC and NOx CAM plans in this renewal of the Title V permit replace the periodic monitoring requirements for these two pollutants in the former Title V permit.)

Wellons/dryer system Recordkeeping

Recordkeeping requirements for the Wellons/dryer system are principally from the 1/22/07 permit; including fuel consumption records, and startup-shutdown-malfunction records. The recordkeeping subsection also includes a cross-reference to MACT requirements as set out in section IV of the permit.

Wellons/dryer system Testing

Testing for the Wellons/dryer system includes once-per-permit-term testing for PM. This subsection also includes the general testability requirement from the 1/22/07 permit for the system. The

system. The testing subsection also includes a cross-reference to MACT requirements as set out in section **IV** of the permit.

Wellons/dryer system Reporting

The reporting subsection includes cross-references to: (a) reporting required as part of the COM monitoring requirements for the Wellons/dryer system, (b) site wide general conditions for reporting, and (c) reporting in the MACT section as set out in section **IV** of the permit.

Section III.C of the Title V Permit – Thermal Oil Storage Tank (Emission Unit 3752)

Thermal Oil Storage Tank Limitations

None.

Thermal Oil Storage Tank Monitoring

None.

Thermal Oil Storage Tank Recordkeeping

The recordkeeping requirement consists of records of the physical specifications of the tank as required by the 1/22/07 permit.

Thermal Oil Storage Tank Testing

None.

Thermal Oil Storage Tank Reporting

None.

Section III.D of the Title V Permit – Forming/Pressing System (Emission Units 6800, 6900, and 7000)

Forming/Pressing System Limitations

The limits for the forming/pressing system are from the 1/22/07 permit, and include specification of air pollution control devices and their operation, visible emissions limits, and emissions limits. The limitations subsection also includes a cross-reference to MACT limitations as set out in section **IV** of the permit.

Forming/Pressing System Monitoring

Monitoring for the forming/press system includes periodic visible emission observations for the RTO/TCO stack and the two low pressure material handling stacks. The monitoring subsection also includes a cross-reference to MACT requirements as set out in section **IV** of the permit.

Finally, VOC emissions from the press are subject to CAM. A CAM plan for this PSEU is attached to the permit and implementation of the CAM plan is specified for the press emissions unit. This

unit. This emission unit specific monitoring subsection also includes a cross-reference to General CAM Provisions as set out in section **V** of the permit.

Forming/Pressing System Recordkeeping

Recordkeeping for the forming/pressing system includes records of the RTO/TCO temperature, visible observation logs, and data supporting system emission calculations.

Forming/Pressing System Testing

Testing for the forming/pressing system includes annual TCO catalyst activity testing. This subsection also includes the general testability requirement from the 1/22/07 permit for the system and a cross-reference to MACT requirements as set out in section **IV** of the permit.

Forming/Pressing System Reporting

The reporting subsection includes notification of when the RTO/TCO changes operating mode, and cross-reference to: (a) the site wide general reporting conditions, and (b) reporting in the MACT section as set out in section **IV** of the permit.

Section III.E of the Title V Permit – Trim System (Emission Unit 8000)

Trim System Limitations

The limits for the trim system are from the 1/22/07 permit, and include specification of air pollution control devices, visible emissions limits, and emissions limits.

Trim System Monitoring

Periodic visible emissions observations are required for the trim system.

Trim System Recordkeeping

Recordkeeping for the trim system includes visible observation logs, and records of data used for emission calculations for the system.

Trim System Testing

This subsection includes the general testability requirement from the 1/22/07 permit for the system.

Trim System Reporting

The reporting subsection consists of cross-reference to the site wide general reporting conditions.

Section III.F of the Title V Permit – Finishing System (Emission Unit 9000)

Finishing System Limitations

The limits for the finishing system are from the 1/22/07 permit, and include specification of air pollution control devices, visible emissions limits, and emissions limits. The limitations subsection also

subsection also includes a cross-reference to MACT limitations as set out in section **IV** of the permit.

Finishing System Monitoring

Periodic visible emissions observations are required for the material handling system 9600 and the spray booths. The monitoring subsection also includes a cross-reference to MACT requirements as set out in section **IV** of the permit.

PM10 emissions from the sander are subject to CAM. A CAM plan for this PSEU is attached to the permit and implementation of the CAM plan is specified for the sander (material handling system 9500). This emission unit specific monitoring subsection also includes a cross-reference to General CAM Provisions as set out in section **V** of the permit. (Note: The PM10 CAM plan in this renewal of the Title V permit replaces the periodic monitoring requirements for this pollutant from material handling system 9500 in the former Title V permit.)

Finishing System Recordkeeping

Recordkeeping for the finishing system includes visible observation logs, and records of data used for emission calculations for the system. The recordkeeping subsection also includes a cross-reference to MACT requirements as set out in section **IV** of the permit.

Finishing System Testing

This subsection includes the general testability requirement from the 1/22/07 permit for the system.

Finishing System Reporting

The reporting subsection includes cross-reference to: (a) the site wide general reporting conditions, and (b) reporting in the MACT section as set out in section **IV** of the permit.

Section III.G of the Title V Permit – General Plant

General Plant Limitations

The limits for the general plant system are from the 1/22/07 permit, and include specification of air pollution control devices, work practices, allowable raw material throughput, visible emissions limits, allowable production rate, and emissions limits.

General Plant Monitoring

Periodic visible emissions observations are required for the material handling system (Emission Unit 8950).

General Plant Recordkeeping

Recordkeeping for the general plant includes records of the raw material throughput, production rate, visible observation logs, and data supporting system emission calculations.

General Plant Testing

This subsection includes the general testability requirement from the 1/22/07 permit for the plant.

General Plant Reporting

The reporting subsection consists of cross-reference to the site wide general reporting conditions.

Section IV of the Title V Permit – Plywood and Composite Wood Products (PCWP) MACT

In this section the PCWP MACT applicable requirements for the facility are parroted from the 40 CFR 63 subpart DDDD as shown as of 9/19/07.

PCWP – General

This subsection includes general provisions related to the PCWP MACT including: (a) reference to the Part 63 General Provisions, (b) where terms are defined, and (c) the compliance date.

PCWP Limitations

This subsection includes compliance options, work practice standards, requirements during periods of startup, shutdown, and malfunctions, how to show initial compliance with each compliance option, when initial compliance demonstrations must be made, and how to show continuous compliance with each compliance option.

PCWP Monitoring

This subsection includes continuous parameter monitoring system installation, operation, and maintenance requirements, and data collection requirements.

PCWP Recordkeeping

This subsection includes recordkeeping requirements for notifications and reports, startup-shutdown-malfunctions events, and performance tests.

PCWP Testing

This subsection includes performance test requirements; including when and how they must be conducted.

PCWP Reporting

This subsection includes both notification and reporting requirements including (a) reports of failures to meet compliance requirements, (b) general notification requirements, (c) performance test notifications, (d) general reporting requirements, and (e) deviation reporting.

Section V of the Title V Permit – General CAM Provisions

As mentioned above, PSEU-specific applicable requirements are included with the monitoring requirements for each emissions unit to which CAM is applicable. Section V contains those CAM provisions that are universally applicable to PSEUs subject to CAM.

Section V requirements include: a listing of the minimum CAM topics to be included in each plan, specifications for the operation of approved monitoring, Quality Improvement Plan (QIP) requirements, reporting and recordkeeping requirements, and definition of appropriate responses to an excursion or exceedance.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

D. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-2003”.

H. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors meeting the requirements of 9 VAC 5-50-410 or 9 VAC 5-40-41. The continuous opacity monitor for the Wellons/dryer system meets the requirements of 9 VAC 5-50-410.

W. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition **W** and General Condition **H**. For further explanation see the comments on general condition **H**.

STATE ONLY APPLICABLE REQUIREMENTS

None

FUTURE APPLICABLE REQUIREMENTS

In their decision dated 6/8/07 the District of Columbia Circuit Court of Appeals vacated 40 CFR Subpart DDDDD (the boiler MACT). Specific guidance on how to address this situation is currently being considered, and will be applied when available. Prior to vacatur, the Wellons energy system was subject to the boiler MACT.

INAPPLICABLE REQUIREMENTS

The inapplicable requirements, as described in the table of Section **VIII** of this Title V permit are:

40 CFR 60 Subpart Ea	Standards of Performance for Municipal Waste Combustors for which construction is commenced after 12/20/89 and before 9/20/94
40 CFR 61 Subpart V	National Emission Standard for Equipment Leaks (Fugitive Emission Sources)

COMPLIANCE PLAN

None at this time.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units are shown in the table contained in Section **VII** for the permit.

CONFIDENTIAL INFORMATION

None

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Lynchburg News and Advance from

10/18/07 to 11/19/07 .

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Georgia-Pacific Wood Products LLC
11795 Brookneal Highway (Hwy 501S) Gladys, Virginia
Permit No. SCRO30903

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Georgia-Pacific Wood Products LLC has applied for a Title V Operating Permit for its "Brookneal" Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:		Date:	
Air Permit Manager:		Date:	
Regional Director:		Date:	

FACILITY INFORMATION

Permittee

Georgia-Pacific Wood Products LLC
P.O. Box 340
Brookneal, VA 24528

Facility

Georgia-Pacific Wood Products LLC
11795 Brookneal Highway (Hwy 501S)
Gladys, Virginia

County-Plant Identification Number: 51-031-00163

SOURCE DESCRIPTION

NAICS Code: 321219 - The facility manufactures a reconstituted wood product known as oriented strandboard (OSB).

Based on Georgia-Pacific's (GP) permit renewal application, the facility is a Title V major source of PM10, NOx, CO, VOC, HCl, and methanol. This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was previously permitted under a Minor NSR Permit issued on January 22, 2007.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units, pollution control devices, and stacks are those units as described in the table in Section II of this Title V permit.

EMISSIONS INVENTORY

A copy of the 2006 annual emission update is **attached**.

EMISSION UNIT APPLICABLE REQUIREMENTS -

On 12/20/07, SCRO received GP's letter dated 12/19/07 requesting that the terminology "permanent total enclosure" be changed to "wood products enclosure" for the press in their current NSR and Title V permits. The changed terminology is contained in condition 6 of the NSR permit. In their letter dated 2/29/08, GP made the additional request to remove the NSPS Subpart Kb applicable requirements for the site's thermal oil storage tank. The NSR and Title V permits are being administratively amended to reflect the change in NSR condition 6, and to eliminate the NSPS Subpart Kb applicable requirement (NSR condition 18). (See NSR engineering analysis:

U:\THB\GP_BROOK\Wood Prod Enc\30903.Etb_2.0.doc for addition discussion.)

GENERAL CONDITIONS

No changes from the January 6, 2008 Title V permit.

STATE ONLY APPLICABLE REQUIREMENTS

None. No changes from the January 6, 2008 Title V permit.

FUTURE APPLICABLE REQUIREMENTS

No changes from the January 6, 2008 Title V permit.

INAPPLICABLE REQUIREMENTS

No changes from the January 6, 2008 Title V permit.

COMPLIANCE PLAN

None. No change from the January 6, 2008 Title V permit.

INSIGNIFICANT EMISSION UNITS

Since the NSPS requirements were the only applicable requirements for the thermal oil storage tank, and since, based on calculations submitted for a similar facility¹, this tank's emissions are less than significant as defined in 9 VAC 5-80-720 B, Tank 3752 is moved to the insignificant emission unit table. Otherwise, there are no changes from the January 6, 2008 Title V permit.

CONFIDENTIAL INFORMATION

None. No change from the January 6, 2008 Title V permit.

PUBLIC PARTICIPATION

None. In accordance with 9 VAC 5-80-200 no public participation is required for administrative amendments to Title V permits.

¹ See Tanks 4 calculations for Huber's 2008 Title V renewal application which shows that the annual emissions from a similarly sized thermal oil storage tank are ~ 0.1 pound/year.